

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Ford Motor Company,

Plaintiff/
Counter-Defendant,

v.

**Versata Software, Inc., f/k/a Trilogy
Software, Inc., Trilogy Development
Group, Inc. and Trilogy, Inc.,**

Defendants/
Counter-Plaintiffs.

Case No. 15-10628-MFL-EAS
(consolidated with Case No. 15-cv-11624)

Hon. Matthew F. Leitman

JURY TRIAL DEMANDED

**JOINT MOTION TO
MODIFY CALENDAR DATES**

Ford Motor Company (“Ford”) and Versata Software, Inc., f/k/a Trilogy Software, Inc., Versata Development Group, Inc. and Trilogy, Inc. (“Versata”) jointly seek leave to request the following modifications to the pretrial calendar to permit the parties and the Court to address the motions permitted in the Court’s August 8, 2019 Order (Dkt. #687). Because the motions permitted in the Court’s Order, if granted in whole or in part, are likely to have a material impact on the scope of the claims, witnesses and evidence in this case, modifying the pretrial calendar as

proposed will avoid investing significant party and Court resources on pretrial matters rendered moot by the motions permitted in the Court's August 8, 2019 Order.

Accordingly, the parties propose the following modifications:

<u>EVENT</u>	<u>CURRENT DATE</u>	<u>NEW DATE</u>
Pretrial Disclosures	August 8	August 15
Supplemental MILs. Each side may file up to 10 pages based on new issues raised in the other side's pretrial disclosures. The parties shall meet and confer before filing any supplemental MILs.	August 14	August 28
MIL Responses (not to exceed 25 pages).	August 20	September 4
Objections to pretrial disclosures	August 27	September 10
Responses to supplemental MILs.	August 28	September 11
Summary Judgment and Daubert Hearing re: PDO-R2 Issues Proposed claim construction hearing re: '080 patent (if Ford granted leave to file briefing and Court does not refer issue to Special Master).	August 28	September 11
Deposition designations: objections to counter designations / provide counter-counter designations	September 3	September 17
Joint Final Pretrial Order	September 26	
Parties to submit Joint Bench Book, including jury instructions and verdict form, and courtesy copy of exhibit binders (see Dkt. No. 295)	October 8	

Final Pretrial Conference	October 15	
Trial	November 5	

Dated: August 9, 2019

BROOKS KUSHMAN P.C.

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